

February 6, 2006

Ms. Marlene H. Dortch, Office of the Secretary Federal Communications Commission 445 12<sup>th</sup> Street, S.W. Washington, D.C. 20554

RE: Certification of CPNI Filing (2-6-06) EB-06-TC-060

Dear Ms. Dortch:

Enclosed please find, in accordance with the Commission's Public Notice, DA-06-223, dated January 30, 2006, and Section 64.2009(e) of the Commission's Rules, our compliance certificate and accompanying statement for the year ended December 31, 2005.

Very truly yours,

Luis G. Romero Font

Luis G. Romero Font President

Attachments



## **CERTIFICATION**

I, Luis G. Romero Font, hereby certify this 6th day of February, 2006 that I am an officer of Optivon, Inc. and that I have personal knowledge that Optivon, Inc. has operating procedures that are adequate to ensure compliance with the Customer Proprietary Network Information rules set fourth in 47 C.F.R. §§ 64.2001-2009.

Luis G. Romero Font

Luis G. Romero Font

President



Optivon, Inc. ("Carrier") has established operating procedures for the compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of consumer proprietary network information ("CPNI").

- Carrier has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- Carrier educates and trains its employees regarding the appropriate use of CPNI. Carrier has established disciplinary procedures should an employee violate the CPNI procedures established by Carrier.
- Carrier maintains a record of the sales and marketing campaigns performed by its and its affiliates' where customers' CPNI are used. Carrier also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.
- A supervisory review process has been established by Carrier regarding compliance with the CPNI rules with respect to outbound marketing situations and records of carrier compliance are kept for a minimum period of one year. Specifically, Carrier's sales force obtains supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI.